

## REMARKS

Reconsideration of this application is respectfully requested. Claims 1-8, 10-15, and 18-23, 25, 27-29, 33-40, 42-46 and 48-50 stand rejected under 35 U.S.C. §102(e) as being anticipated by Cronin, U.S Patent No. 6,182,127. Claims 9, 16, 24, 26 and 30-32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Cronin in view of Knowlton, U.S Patent No. 5,973,692. Claims 17, 41 and 47 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Cronin in view of Chiu, U.S Patent No. 5,909,518.

No claims have been canceled, amended, or added. A petition for a three-month extension of time has also been submitted with this response.

The Office Action rejected claims 1-8, 10-15, 18-23, 25, 27-29, 33-40, 42-46 and 48-50 under 35 U.S.C. §102(e) as being anticipated by Cronin. The Office Action states:

Referring to claim 1, Cronin discloses an apparatus comprising a multi-image viewer to display images within a single window (col. 3, line 65) in a network system (col. 1, line 58), the viewer enabling manipulation of a displayed image (col. 4, lines 38-39), the image being a raster graphics file (col. 6, line 52), each of the images having a separate data file (col. 1, line 60 and col. 5, line 53).

(Office Action, page 2)

However, applicant respectfully asserts that claim 1 is not anticipated by Cronin under 35 U.S.C. §102(e).

Cronin discloses a computer program to generate a single window to view different portions of a single image that all are derived from the same base file. Cronin divides up the different portions of the single image and different resolutions of the

single image into a grid of view tiles. Cronin generates a common HTML output file composed of the grid of view tiles for that single image. Cronin discloses:

[A] user requests an image view 110 (FIG. 2) having a scale and region specified by means of a specially formatted Uniform Resource Locator (URL) code using HTTP language which the Web server can decode as a request to be passed to the image view composition software and that identifies the image file to be viewed, the scale of the view and the region of the image to view. The network image server sends HTML data to the client with pre-computed hyperlinks, such that following a hyperlink by clicking on an area of an image will send a specific request to the server to deliver a different area of the drawing or to change the resolution of the image. (Col. 3, Lns. 20-31) (emphasis added)

[T]he invention is the computer program recorded on magnetic or optical media for use on a network server comprising code which interprets HTTP requests from a workstation for a particular view of a digital document image file stored in memory, retrieves the digital document image file; composes a grid of view tiles corresponding to the requested view of the image, computes HTML code for the grid of view tiles in a form which can be transmitted from the server to the workstation. (Col. 2, Lns. 6-14) (emphasis added)

The foreground view composer software interprets the view request, computes which view tiles are needed for the view, creates the view tiles 160 needed for the view, and then creates Hypertext Markup Language (HTML) output file to describe the view composition to the Web browser, unless the necessary view tiles to fulfill the request are already computed and stored in cache memory of the workstation, in which case the already-computed tiles are recovered by the Web browser. (Col. 3, Lns. 20-31) (emphasis added)

The generation of the view tiles 160 is handled by an image tiling routine which divides a given page, rendered as an image, into a grid of smaller images (FIG. 3A) called view tiles is A1, A2, B1, etc. (or just tiles in the image view server context). These tiles are computed for distinct resolutions (FIG. 3B) of a given image at the server according to the URL. (Col. 3, Ln. 60- Col. 4, Ln. 1) (emphasis added)

Cronin distinguishes its disclosed invention from the prior art by stating:

To view an image [in prior art], the application software transfers a copy of the whole image file from the image file server to the networked client workstation. . . . A still further object [of Cronin's invention] is to provide a computer program which facilitates requesting portions of graphical images stored on a network server and displaying those portions on a workstation. (Col. 1 Lns. 19-52) (emphasis added)

In contrast, claim 1 states:

1. a multiple-image viewer to concurrently display multiple images within a single window in a network system, the viewer enabling manipulation of a displayed image, the displayed image being a raster graphics file, each of the displayed images having a separate data file. (emphasis added)

Cronin does not disclose concurrently displaying multiple images in a single window. Accordingly, Cronin cannot disclose each of the concurrently displayed images having a separate data file. Therefore, Cronin does not disclose or suggest the limitations stated in claim 1. As such, independent claim 1 is not anticipated by Cronin under 35 U.S.C. §102(e).

Given that claims 2-8, 10-15, 18-23, 25, 27-29 depend from and include the limitations of claim 1, applicant submits that claims 2-8, 10-15, 18-23, 25, 27-29 are not anticipated by Cronin under 35 U.S.C. §102(e).

Independent claim 33 includes the limitation "a computer program to manipulate and to display multiple images within a single window, . . . each of the displayed images having a separate data file." As discussed above, Cronin does not disclose concurrently displaying multiple images in a single window and each of the concurrently displayed images having a separate data file. Therefore, Cronin does not disclose or

suggest the limitations stated in claim 33. As such, independent claim 33 is not anticipated by Cronin under 35 U.S.C. §102(e).

Given that claims 34-37 depend from and include the limitations of claim 33, applicant submits that claims 34-37 are not anticipated by Cronin under 35 U.S.C. §102(e).

Independent claim 38 includes the limitation “displaying multiple raster graphic images in the window, each of the multiple raster graphic images having a separate data file.” As discussed above, Cronin does not disclose displaying multiple raster graphic images in a single window and each of the displayed raster graphic images having a separate data file. Therefore, Cronin does not disclose or suggest the limitations stated in claim 38. As such, independent claim 38 is not anticipated by Cronin under 35 U.S.C. §102(e).

Given that claims 39, 40, 42 and 43 depend from and include the limitations of claim 38, applicant submits that claims 39, 40, 42 and 43 are not anticipated by Cronin under 35 U.S.C. §102(e).

Independent claim 44 includes the limitation “means for displaying multiple raster graphic images in the window, each of the multiple raster graphic images having a separate data file.” As discussed above, Cronin does not disclose displaying multiple raster graphic images in a single window and each of the displayed raster graphic images having a separate data file. Therefore, Cronin does not disclose or suggest the limitations stated in claim 44. As such, independent claim 44 is not anticipated by Cronin under 35 U.S.C. §102(e).

Given that claims 45, 46, and 48-50 depend from and include the limitations of claim 44, applicant submits that claims 45, 46, and 48-50 are not anticipated by Cronin under 35 U.S.C. §102(e).

The Examiner rejected Claims 9, 16, 24, 26 and 30-32 under 35 U.S.C. §103(a) as being unpatentable over Cronin in view of Knowlton. The Examiner states:

Referring to claim 9, Cronin does not disclose where the image has a folder with a hierarchical structure. Knowlton discloses a directory with a hierarchical structure (col. 19, lines 17- 24). At the time the invention was made it would have been obvious to a person of ordinary skill in the art to utilize a image directory with a hierarchical structure. One of ordinary skill in the art would have been motivated to do this to provide an aid to the user to select graphics images.

(Office Action, page 7)

However, applicant respectfully asserts that independent claim 1 is not obvious in view of Knowlton and Cronin.

As discussed above, Cronin does not disclose concurrently displaying multiple images in a single window and each of the concurrently displayed images having a separate data file.

Likewise, Knowlton also teaches the display of one image per window. Knowlton discloses:

Finally, the various images and versions of images used by the visual Link Capture Engine 138 of the present invention and described above are illustrated in FIG. 2A wherein Image 210 represents the original image of an HTML page or document, or other graphics image, and Grayscale Image 212 represents the 1/4 size grayscale image generated from Original Image 210 and Filtered Grayscale Image 214 represents low pass filtered, that is, coarsened and blurred image generated from Grayscale Image 212 and Edge Image 216, in turn, represents the edge image generated from Filtered Grayscale Image 214. (Col. 19, Lns. 20-35) (emphasis added)

Knowlton does not disclose concurrently displaying multiple images in a single window and each of the concurrently displayed images having a separate data file.

Therefore, in view of the above distinction, neither Knowlton nor Cronin, individually or in combination, disclose each and every limitation of claim 1. As such, claim 1 is not rendered obvious by Knowlton in view of Cronin under 35 U.S.C. §103(a).

Given that claims 9, 16, 24, 26 and 30-32 depend from and include the limitations of claim 1, applicant submits that claims 9, 16, 24, 26 and 30-32 are not obvious in view of Cronin and Knowlton.

It is also respectfully submitted that Knowlton does not suggest a combination with Cronin, and Cronin does not suggest a combination with Knowlton. It would be impermissible hindsight to combine Knowlton with Cronin based on applicants' own disclosure.

The Examiner rejected Claims 17, 41 and 47 under 35 U.S.C. §103 (a) as being unpatentable over Cronin in view of Chiu. The Examiner states:

Referring to claim 17, Cronin does not disclose image compression according to a block based integer wavelet transform scheme. Cronin does disclose image compression (col. 8, line 36). The applicant discloses in paragraph 50 a block-based integer wavelet transform entropy coding scheme found in Chiu (col. 2, line 60). At the time the invention was made it would have been obvious to a person of ordinary skill in the art to utilize a block-based integer wavelet transform entropy coding scheme for compression. One of ordinary skill in the art would have been motivated to do this because wavelet transform is a standard data compression scheme and the type of compression scheme used would not affect the nature of the invention.

(Office Action, page 8)

However, applicant respectfully asserts that independent claim 1 is not obvious in view of Chiu and Cronin.

As discussed above, Cronin does not disclose concurrently displaying multiple images in a single window and each of the concurrently displayed images having a separate data file.

Chiu merely discloses a block-based integer wavelet transform entropy coding scheme for compression. Chiu is completely silent about concurrently displaying multiple images in a single window and each of the concurrently displayed images having a separate data file. If a reference does not discuss a limitation, then that reference cannot teach or suggest that limitation.

Therefore, in view of the above distinction, neither Chiu nor Cronin, individually or in combination, disclose each and every limitation of claim 1. As such, claim 1 is not rendered obvious by Chiu in view of Cronin under 35 U.S.C. §103(a).

Given that claim 17 depends from and includes the limitations of claim 1, applicant submits that claim 17 is not obvious in view of Cronin and Chiu.

Independent claim 38 includes the limitation "displaying multiple raster graphic images in the window, each of the multiple raster graphic images having a separate data file." As discussed above, Cronin does not disclose displaying multiple raster graphic images in a single window and each of the displayed raster graphic images having a separate data file. Chiu is completely silent about displaying multiple images in a single window and each of the displayed images having a separate data file.

Therefore, neither Chiu nor Cronin, individually or in combination, disclose each and every limitation of claim 38. As such, claim 38 is not rendered obvious by Chiu in view of Cronin under 35 U.S.C. §103(a).

Given that claim 41 depends from and includes the limitations of claim 38, applicant submits that claim 41 is not rendered obvious by Chiu in view of Cronin under 35 U.S.C. §103(a).

Independent claim 44 includes the limitation “means for displaying multiple raster graphic images in the window, each of the multiple raster graphic images having a separate data file.” As discussed above, Cronin does not disclose a means for displaying multiple raster graphic images in a single window and each of the displayed raster graphic images having a separate data file. Chiu is completely silent about displaying multiple images in a single window and each of the displayed images having a separate data file. Therefore, neither Chiu nor Cronin, individually or in combination, disclose each and every limitation of claim 44. As such, claim 44 is not rendered obvious by Chiu in view of Cronin under 35 U.S.C. §103(a).

Given that claim 47 depends from and includes the limitations of claim 44, applicant submits that claims 47 is not rendered obvious by Chiu in view of Cronin under 35 U.S.C. §103(a).

It is also respectfully submitted that Chiu does not suggest a combination with Cronin, and Cronin does not suggest a combination with Chiu. It would be impermissible hindsight to combine Chiu with Cronin based on applicants' own disclosure.



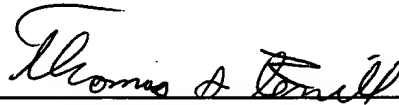
Conclusion

It is respectfully submitted that in view of the amendments and remarks set forth herein, the rejections and objections have been overcome. A petition for an extension of time is submitted with this amendment. If there are any additional charges, please charge them to our Deposit Account No. 02-2666. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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Thomas S. Ferrill

Reg. No.: 42,532

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1026  
(408) 720-8300